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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

9  
10  
11 DANA SCHEBLER, an individual,  
12  
13 Plaintiffs,  
vs.

Case No.: 2:18-cv-02362-KJD-GWF

**STIPULATION AND ORDER TO  
REMAND**

14 COSTCO WHOLESALE CORPORATION, a  
15 Washington Corporation; JAIME  
16 MORREIRA, an individual; and DOES 2  
through 20, inclusive,  
17  
18 Defendants.

19 COMES NOW, Plaintiff, DANA SCHEBLER (hereinafter "Plaintiff"), by and through her  
20 attorneys of record, The Bourassa Law Group, and Defendants, COSTCO WHOLESALE  
21 CORPORATION and JAIME MORREIRA, by and through their attorneys of record, Backus, Carranza  
22 & Burden and hereby stipulate as follows:

23 1. On October 30, 2018, Plaintiff commenced an action in the Eighth Judicial District Court  
24 entitled *Schebler v. Costco Wholesale Corporation, et. al.* as Case Number A-18-783639-C.

25 2. Defendant Costco Wholesale Corporation was served with Plaintiff's Complaint on  
26 November 1, 2018.

27 3. On December 12, 2018, Defendant Costco Wholesale Corporation filed a Notice of  
28 Removal in the United State District Court for the District of Nevada, based on diversity jurisdiction

1 pursuant to 28 U.S.C. § 1332(a)(1).

2 4. At the time of filing the notice of removal, there was complete diversity in this matter as  
3 Plaintiff is a citizen of Nevada and Costco is a foreign corporation incorporated in the State of Washington.

4 5. Subsequently, Defendant Costco Wholesale Corporation revealed the identity of an  
5 employee alleged to be involved in this matter and the parties stipulated to allow Plaintiff to amend the  
6 pleadings to substitute Defendant Jaime Morreira, a Nevada resident, for a DOE Employee.

7 6. On February 20, 2019, Plaintiff filed her First Amended Complaint naming both Costco  
8 Wholesale Corporation and Jaime Morreira as defendants.

9 7. On February 22, 2019, Defendants filed an Answer, admitting that Defendant Jaime  
10 Morreira is a resident of Clark County, Nevada.

11 8. There are no motions pending in this action.

12 WHEREFORE, IT IS HEREBY STIPULATED AND AGREED that this Court no longer has  
13 jurisdiction under 28 U.S.C. § 1332(a)(1) for this matter and that this action should be remanded back to  
14 the Eighth Judicial District Court for the State of Nevada in and for the County of Clark pursuant to 28  
15 U.S.C. § 1447(e).

16 IT IS FURTHER STIPULATED AND AGREED that each party shall bear its own attorneys' fees  
17 and costs with respect to the removal and subsequent remand of the action pursuant to this stipulation and  
18 order.

19  
20 DATED this 8th day of March, 2019

DATED this 8th day of March, 2019

21 BOURASSA LAW GROUP

BACKUS, CARRANZA & BURDEN

22  
23 By: /s/ Mark J. Bourassa, Esq.  
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1. The parties' stipulation is approved;
2. There are no pending motions; and
3. Case number 2:18-cv-02362-KJD-GWF styled *Schebler v. Costco Wholesale Corporation*,

**IT IS SO ORDERED .**

  
UNITED STATES DISTRICT COURT JUDGE  
Case No. 2:18-cv-02362-KJD-GWF

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